

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WESTERN DIVISION

CIVIL ACTION NO. 3:05-CV-30109-MAP

JOANN PELLETIER,
Plaintiff

vs.

CHITRA PUBLICATIONS and
SANDRA T. TALBOT,
Defendants

JOINT STATEMENT OF THE PARTIES PROPOSING PRETRIAL SCHEDULE

Now come the parties¹, JoAnn Pelletier and Sandra T. Talbot, and hereby submit the following proposed Pretrial Schedule pursuant to Federal Rules of Civil Procedure 16.

This matter arises out of a complaint for injunctive relief and damages alleging copyright infringement, false designations of origin under the Lanham Act and unfair competition under Mass. General Laws Chapter 93A.

1. The parties' initial written disclosures pursuant to Federal Rules of Civil Procedure 26(a) shall be served on or before February 16, 2006, with the production of documents referenced in the disclosures to be made in response to Rule 34 requests.
2. All first sets of written discovery, with the exception of Requests for Admissions, shall be served on or before March 16, 2006 and due on or before April 17, 2006.
3. All nonexpert depositions will be completed by June 16, 2006.

¹ Entry of default as to the defendant, Chitra Publications, was made on October 13, 2005.

4. All Requests for Admissions shall be served by July 16, 2006 with responses due by August 16, 2006.
5. The plaintiff will serve disclosures and reports of all expert witnesses required under Federal Rules of Civil Procedure 26(a)(2) by August 10, 2006 and depositions of plaintiff's experts will be completed by September 11, 2006.
6. Defendant will serve disclosures and reports of all expert witnesses required under Federal Rules of Civil Procedure 26(a)(2) by October 8, 2006 and depositions of defendant's experts will be completed by November 13, 2006.
7. All motions for summary judgment will be filed with the court by December 17, 2006.
8. Oppositions to any motions for summary judgment will be filed by January 15, 2007 with replies to the oppositions filed by January 29, 2007.
9. The Court will schedule a final Pretrial Conference to establish trial dates.

THE PLAINTIFF
JOANN PELLETIER

THE DEFENDANT
SANDRA T. TALBOT

By */s/ Claire L. Thompson*

By */s/ Steven M. Coyle*

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Dated: February 1, 2006